

**IN THE UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF PENNSYLVANIA**

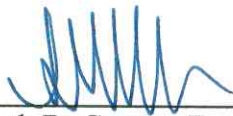
THE MIDDLE EAST FORUM	:	CIVIL ACTION
	:	NO. 2:19-cv-05697-JS
Plaintiff,	:	
v.	:	
	:	
LISA REYNOLDS-BARBOUNIS	:	MOTION FOR SANCTIONS
	:	
Defendant.	:	

MOTION FOR RECONSIDERATION

Defendant, Lisa Reynolds-Barbounis hereby moves the Court pursuant to Federal Rule of Civil Procedure 59(e)1 and Local Civil Rule 7.1(g), for reconsideration of this Court's January 15, 2020 Order compelling Defendant, Lisa-Reynolds-Barbounis to turn over five electronic devices including three cellular telephones and two laptop computers, so that all five devices may be imaged and directly produced to the Plaintiff almost no restriction.¹ The Court's January 15, 2020 Order also compels the direct disclosure of all electronic data associated with Defendant's social media accounts, to the extent they are connected with Plaintiff's electronic devices, including but not limited to, iCloud accounts, Dropbox, WhatsApp backups, Telegram, Google Drive, Facebook, and Wickr.

¹ The only limitations provided for in the January 15, 2020 Order are as follows: Cornerstone shall only exclude from its imaging of these devices the following: (1) emails, texts, and other communications to or from Seth Carson, Derek Smith Law Group (e-mail: seth@dereksmithlaw.com and phone: 484-678-2210), Mike Yoder (phone: 202-595-4504), Patrick Sandman (phone: 609-457-6029); (2) emails, texts, and other communications to or from Vasili Barbounis (phone: 215.439.1002), Jane Reynolds (phone: 856-287-1436), Greg Reynolds (267-761 8622), David Reynolds (856-287-1602), and email addresses coming to or from a state.gov domain, except if such emails, texts, and other communications mention The Middle East Forum ("MEF") or its principals Daniel Pipes, Gregg Roman, or Marc Fink, and if a text message chain to or from Vasili Barbounis mentions such entity or individuals, the text chain for a 12 hour period before and after that time shall be captured; (3) emails, texts, and other communications with Randy Weber (email: randy@randyweber.org, phone: 281-744-7300, 281-480-8914), Ryan Costello (phone: 610-504-3296), Chara McMichael, except if such emails, texts, and other communications mention The Middle East Forum ("MEF") or its principals Daniel Pipes, Gregg Roman, or Marc Fink, and if a text message chain to or from Randy Weber, Ryan Costello, and/or Chara McMichael mentions such entity or individuals, the text chain for a 12 hour period before and after that time shall be captured. All images recovered by Cornerstone shall be jointly reviewed by Mr. Seth Carson and Ms. Martha Vázquez with a Cornerstone representative for relevance at a time mutually agreeable to both attorneys. All data, images, documents, and other information obtained from Barbounis' devices shall be subject to Attorney's Eyes Only.

RESPECTFULLY SUBMITTED

By:  _____

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Attorney for Defendant, Lisa Reynolds-Barbounis

DATED: January 20, 2020